

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER ECKHART and CATHY AREU,	:	
	:	
Plaintiffs,	:	Civil Case No. 1:20-cv-05593
	:	
against	:	
	:	
FOX NEWS NETWORK, LLC, ED HENRY,	:	
SEAN HANNITY, TUCKER CARLSON and	:	
HOWARD KURTZ, in their individual and	:	
professional capacities,	:	
	:	
Defendants.		
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**AFFIDAVIT OF ROBERT GALKER IN SUPPORT OF
DEFENDANTS' RULE 11 MOTION FOR SANCTIONS**

I, Robert Galker, affirm the following to be true under penalty of perjury pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9:


1. I have been an employee of Fox News Network, LLC ("Fox News") since 1998, and am currently the Vice President, Satellite Operations. I have been in that role since July 2016. I am fully familiar with the facts and circumstances set forth herein and make this Affidavit in Support of Defendants' Rule 11 Motion for Sanctions.
2. One of my duties is to manage the business relationship with VideoLink, a video production contractor. There are certain occasions when my employer requires live shots to be produced remotely from a rented studio. VideoLink facilitates this need by acting as an agent that books studios that are available for rent.

3. A studio that VideoLink has booked on occasion for Fox News is one belonging to public television station WXEL-TV, a South Florida affiliate of the Public Broadcasting Service, <https://www.wxel.org/who-we-are/>. Fox News aired guest appearances by Plaintiff Cathy Areu from WXEL's studio on several occasions. WXEL is not in any way affiliated with Fox News, Fox News has no corporate relationship with WXEL, Fox News has no direct business relationship with WXEL, and Fox News does not have any supervisory role with WXEL.
4. I searched for all VideoLink work orders that were in Fox News' possession for the use of WXEL facilities in February 2020. These records indicate that Ms. Areu did not use WXEL's facilities for Fox News on February 10, 2020. The work orders show that the only dates in February 2020 on which Areu used WXEL's facilities for Fox News appearances were February 4, 2020 and February 12, 2020. The work orders also show that Ms. Areu used WXEL for Fox News appearances on March, 16, 2020 and March 31, 2020.
5. Attached as Exhibit A is a true and correct copy of an email I received from the President and CEO of VideoLink, dated April 23, 2020, which is forwarding an email chain that contains the following statement from the Managing Director, Business Development for the entity that controls WXEL: "The fact that this individual came to our facility not only on March 31st but also two weeks prior, shows a complete disregard for the safety and security of our personnel and facility. Ms. Areu will never be permitted in any of our South Florida facilities again, for any reason."

6. Attached as Exhibit B is a true and correct copy of an email dated April 1, 2020 that I

sent to the Vice President, Operations at Videolink.

Dated: 8/27/20

By: 
Robert Galker